

Law Office of Meredith S. Heller PLLC
www.mshellerlaw.com

99 Park Avenue, Penthouse Suite
New York, NY 10016
Phone: (646) 661-1808
Fax: (646) 661-1746
msheller@mshellerlaw.com

February 8, 2022

VIA ECF

Honorable Laura Taylor Swain
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

**RE: *United States v. Winston Anthony Rose*
19-cr-580 (LTS)**

Dear Judge Swain,

This letter is submitted on behalf of my client Winston Anthony Rose to request (1) that the terms of his supervised release be modified to permit him to travel for work within the United States solely with the Probation Department's prior approval, and (2) that he be permitted to travel to Connecticut from his home in Texas for work from February 13-20, 2022.

Mr. Rose served his sentence and began supervised release on January 13, 2022. The terms of Mr. Rose's release currently limit his travel to the Eastern District of Texas and require that he be monitored by GPS. As your Honor may recall, Mr. Rose works in television production, primarily for ESPN, that requires he travel within the United States. It is respectfully requested that the terms of his supervised release be modified to allow such travel for work with only Probation's prior approval and the removal of the GPS location monitoring only while traveling for his employment.

Mr. Rose currently has a proposed work trip scheduled for February 13-20, 2022, to the Mohegan Sun in Uncasville, Connecticut. Both Mr. Rose's Probation Officer in the Eastern District of Texas, U.S.P.O. Rick Ramos, and the government, through A.U.S.A. Daniel Nessim, have been informed of both these requests and neither one opposes the travel or modification of terms.

Respectfully Submitted,



Meredith S. Heller

The foregoing request for modification of the terms of supervised release is granted. DE 49 is resolved.

SO ORDERED.

2/8/2022

/s/ Laura Taylor Swain, Chief USDJ

Cc: A.U.S.A. Daniel G. Nessim (via ECF)
U.S.P.O. Rick Ramos (via email)